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July 10, 2007

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VIA ELECTRONIC MAIL

Re: *State of Oklahoma v. Tyson, et al.* U.S. District Court for the Northern District of Oklahoma Case No. 05-CV-00329-GKF-SAJ

Dear Theresa:

As promised in the hearing of June 28 and my letter to you of July 6, the State is prepared to narrow its requests for production of documents which are the subject of the State's motion to compel (Dkt. # 1120) and the Court's order thereon (Dkt. # 1207). As regards the request for documents from outside the IRW and in keeping with the Court's order, the State is not seeking raw "data" from anywhere other than within the IRW "at this time," without waiving its right to do so if appropriate later. However, the State is seeking, and the Cargill Defendants must produce, "documents relevant to the corporate knowledge of the Cargill Defendants of detriment to the environment from the application of poultry waste to the ground without any limit as to the date of the documents or the geographical location to which they relate."

In keeping with the Court's ruling, the State limits its requests for production as to geographic limitations as follows:

1. Limited to information about the constituents of poultry waste/litter/manure within the IRW. No. 6.
2. Limited to 1) reports, analyses, treatises, etc. from all locations, or 2) Poultry Industry and/or Cargill standards or practices from all locations, to show corporate knowledge, and not requesting raw "data" from outside the IRW: Numbers 9, 12, 15, 21, 27, 30, 33, 36, 39, 42, 45, 48, 51, 54, 57, 62, 65, 69, 76, 80, 82, 84, and 113.
3. Limited to form contracts, manuals, or other documents establishing or explaining the nature of the legal relationship between the Cargill Defendants and contract growers from

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Exhibit 2

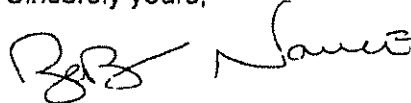
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all locations, to show corporate knowledge, and not requesting all executed contracts with growers outside the IRW: No. 105.

I hope you find this information helpful. As regards the State's request for documents predating 2002, we look forward to receiving an inventory of "what records [Cargill Defendants] have of such past operations and the cost of producing such information." We would appreciate that information at your earliest convenience to prepare for our meet and confer, hopefully to be scheduled during the week of July 9, as we need to schedule similar meetings with the other Defendants as well. When would you be available that week to conduct this meet and confer? Please call to schedule the meet and confer.

Sincerely yours,

A handwritten signature in black ink, appearing to read "R. A. Nance".

Robert A. Nance
FOR THE FIRM

Cc: Kelly Burch, Esq.
Trevor Hammons, Esq.